



Michael O. Leavitt
Governor
Kathleen Clarke
Executive Director
Lowell P. Braxton
Division Director

State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

1594 West North Temple, Suite 1210
PO Box 145801
Salt Lake City, Utah 84114-5801
801-538-5340
801-359-3940 (Fax)
801-538-7223 (TDD)

November 16, 2001

TO: Internal Files

FROM: Karl R. Houskeeper, Reclamation Specialist II *KRH beg sm*

RE: Midterm Review, West Ridge Resources, Inc., West Ridge Mine, C/007/041-MT01, Carbon County, Utah

SUMMARY:

Elements selected for review during the Midterm were outlined in the Division's letter to West Ridge Resources, Inc. on October 4, 2001. Items #1, #2 & #6 are discussed in this memo.

Each item is listed below in order for a quick reference:

- #1-An AVS check to ensure that Ownership and Control information is current and correct.
- #2-A review of the plan to ensure that the requirements of all permit conditions, division orders, notice of violations abatement plans, and permittee initiated plan changes are appropriately incorporated into the plan document.
- #3-The Division will conduct a technical site visit in conjunction with the assigned compliance inspector to document the status and effectiveness of operational, reclamation, and contemporaneous reclamation practices.

A technical site visit was conducted on November 8, 2001. Division personnel attending the technical site visit will address their assigned items and disciplines under their own memos.

TECHNICAL ANALYSIS:

GENERAL CONTENTS

IDENTIFICATION OF INTERESTS

Regulatory Reference: 30 CFR 773.22; 30 CFR 778.13; R645-301-112

TECHNICAL MEMO

Analysis:

A review of the AVS was conducted to determine that the Ownership and Control information is current and correct. Pamela Grubaugh-Littig, Permit Supervisor, did the review.

Division Order DO00A is still in the process of being resolved. The Division Order addresses surface facilities as-builts. A major concern associated with the Division Order still exists within the Division. The concern is the reclaim-ability of the portal highwall area.

Findings:

The review of the AVS that was conducted by Pamela Grubaugh-Littig, Permit Supervisor showed that the Ownership and Control information is current and correct.

There are still several outstanding items associated the Division Order.

The surface facilities as-builts still need to be updated as indicated in the Division Order to represent the facilities as they are constructed on the ground.

Although the slope stability analysis on the highwall area which was performed by Agapito and Associates, Inc. is felt to be nearly adequate, the prospect of leaving the reclaimed slope unvegetated in order to meet the requirements of the 1.3 long term static safety factor causes a major concern which cannot be approved without additional information from the permittee. It may be necessary to reconfigure the entire reclamation plan for the portal highwall area and any adjacent areas affected by this revised plan in order to meet both the engineering requirements for slope stability and the soils/revegetation requirements of the R645 coal rules.

RECOMMENDATIONS:

The Division Order DO00A and all of the concerns listed in the Order need to be resolved as soon as possible.